

BELLSOUTH

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Vice President-Federal Regulatory

EX PARTE OR LATE FILED

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March 4, 1998

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

Re: CC Docket No. 97-208, CC Docket No. 97-231,
CC Docket No. 97-121, CC Docket No. 97-137,
CC Docket No. 96-98, and RM-9101

Dear Ms. Salas:

This is to inform you that Sid Boren, Randy New, Al Varner, Jim Llewellyn, and the undersigned, all of BellSouth Corporation, and Erwin Krasnow of Verner, Lipfert, Bernhard, McPherson & Hand, met with Commission staff on March 3, 1998. The following Common Carrier Bureau staff members attended some or all of this meeting: Carol Matthey; Melissa Newman; Kenneth Ackerman; Eric J. Bash; Lisa Choi; Tony Dale; Jennifer Fabian; Jordan Goldstein; Ron Kaufman; Bill Kehoe; Michael Kende; Susan Launer; Cyndi Thomas; Joe Welch; and Audrey Wright. Also attending the meeting was JoAnn Lucanik of the Cable Services Bureau.

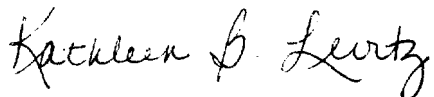
During the meeting the participants discussed issues related to the showings required to demonstrate that an application met the requirements of either Section 271 (c)(1)(A) (Track A) or Section 271 (c)(1)(B) (Track B) of the Communications Act of 1934, as amended. They also discussed issues relating to BellSouth's compliance with the requirements of Section 272 of the Act. Finally they discussed issues related to BellSouth's compliance with Checklist item number 3, Section 271 (c)(2)(B)(iii) of the Act. Attachments 1, 2, and 3 formed the basis for our discussion of these topics.

Attachments 4 and 5 are documents prepared in response to earlier Commission staff requests. Representatives of BellSouth explained and gave copies of these documents to Commission staff at the meeting.

Because the Commission is considering one or more of the issues discussed at the meeting in each of the proceedings identified above, we are filing notice of this ex parte meeting in each of those proceedings.

As required by Section 1.1206(a)(2) of the Commission's rules, we are filing with the Commission two copies of this notice in each of the proceedings identified above. Please associate this notification with each of those proceedings.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen B. Levitz".

Kathleen B. Levitz
Vice-President
Federal Regulatory Affairs

Attachments

cc:	Ken Ackerman	Eric Bash	Lisa Choi
	Tony Dale	Jennifer Fabian	Jordan Goldstein
	Ron Kaufman	Bill Kehoe	Michael Kende
	Susan Launer	Joann Lucanik	Carol Matthey
	Melissa Newman	Cyndi Thomas	Joe Welch
		Audrey Wright	

ATTACHMENT 1

BELLSOUTH STRUCTURES ACCESS APPLICATION GUIDELINES

**JULY, 1997
ISSUE A**

**Prepared by the
BellSouth Competitive Structures Provisioning Center
North W3D2
3535 Colonnade Parkway
Birmingham, Alabama 35243**

**Questions or comments regarding
these guidelines may be referred to:
Steven Chancellor
(205) 977-1862**

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1. INTRODUCTION

- 1.1 **Procedures** - This job aid outlines procedures for submitting and processing requests to access BellSouth outside plant structures including poles, ducts, conduits, and right of way. It is intended for use by Competitive Local Exchange Carriers (Licensees) in making applications to attach to or occupy BellSouth facilities, and by BellSouth representatives who play a role in processing such requests. Licensees and their agents are responsible for being aware of and complying with the terms and conditions of their particular license agreement.
- 1.2 **License Required** - *Prior to making application or using any of these forms, a CLEC MUST HAVE executed an appropriate license agreement with BellSouth.* Any party wishing to attach to BellSouth structures, whether CLEC, CATV, or other entity, must first be licensed by BellSouth. The license shall be granted on a form reviewed and approved by the BellSouth legal department. CLEC Companies wishing to execute a structures access agreement should contact the Competitive Structures Provisioning Center at the address specified in these guidelines.
- 1.3 **Interconnection Not the Same** - An interconnection agreement is not the same as a structures access license agreement. An approved interconnection agreement, by itself, does not authorize an interconnector to access BellSouth poles, ducts, conduits, and right of way.
- 1.4 **Generic Forms** - The forms illustrated herein are generic forms. Specialized forms may also be developed by the CSPC when circumstances warrant.

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- 1.5 Agreement Controls** - These are general procedures. Users should ensure that the specific agreement between the CLEC Licensee and BellSouth is followed. In the event of any conflict between the instructions in this document and an approved CLEC License agreement, the terms of the license will control. In the event of any conflict with any law, the law will control.

2. PROCEDURES FOR NEW OR TRANSFERRED LICENSES

- 2.1 New License Requests** - Any party wishing to attach to BellSouth structures must be licensed by BellSouth. CLEC Companies wishing to attach to BellSouth facilities should contact the Competitive Structures Provisioning Center.
- 2.2 Transfer of Ownership/Merging of Companies** - If a CLEC Licensee purchases, sells, or desires to take under its control another Licensee, BellSouth approval must be obtained. Form NT-13, or other BellSouth approved agreement, shall be used to obtain BellSouth's consent to an assignment.

3. SPOC - COMPETITIVE STRUCTURES PROVISIONING CENTER

3.1 Competitive Structures Provisioning Center (CSPC) - This center, located in Birmingham, serves as the single point of contact for those CLECs wishing to execute structures access license agreements with BellSouth, or to submit requests under existing license agreements. Applications for occupancy and other activities associated with access to structures are coordinated through this central location. There are other groups within the Company responsible for activities other than structures access, such as collocation, network unbundling, and number portability.

The contact information is:

**Competitive Structures Provisioning Center
North W3D2
3535 Colonnade Parkway
Birmingham, Alabama 35243**

Fax: (205) 977-7997

**John Chaucer - Specialist
(205) 977-2631**

**Steven Chancellor - Specialist
(205) 977-1862**

**T.R. (Bob) Thomas - Manager
(205) 977-2862**

4. RECORDS CENTERS AND RECORDS ACCESS

- 4.1 Record Maintenance Centers (RMCs)** - RMCs are the central repositories of official Company plant records. The records maintained by these centers must be made available to CLECs and others that have a legal right to access such records in order to determine availability and suitability of Company facilities for the CLECs intended occupancy or attachment. In Alabama, Kentucky, Louisiana, Mississippi, and Tennessee, the right of way records are also maintained in the RMC, while in other states easement records are maintained in the Regional Landbase Administration Center (RLAC). The addresses of the RMCs are as follows:

For Alabama plant and right of way records: Records Maintenance Center S04 1876 Data Drive Birmingham, AL 35244	For Kentucky plant and right of way records: Records Maintenance Center 601 West Chestnut Street Room 2-SW Louisville, KY 40203
For Louisiana plant and right of way records: Records Maintenance Center 2nd Floor North 6767 Bundy Road New Orleans, LA 70140	For Mississippi plant and right of way records: Records Maintenance Center 5723 Hwy. 18 S Jackson, MS 39209
For Tennessee plant and right of way records: Records Maintenance Center Room 9 B 15 333 Commerce Street Nashville, TN 37201	For Georgia, Florida, North Carolina, and South Carolina plant records: Records Maintenance Center 5228 Central Avenue Charlotte, NC 28212

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- 4.2 Regional Landbase Administration Center (RLAC) -**
This center maintains land base records for the Company, and in addition is the repository for easement and other right of way records for Georgia, Florida, North Carolina, and South Carolina. The RLAC is located at:

Regional Landbase Admin. Center
Attn.: Right of Way Records
16 GG 1 BST
301 W. Bay Street
Jacksonville, FL 32201

5. DEFINITIONS

- 5.1 ALEC - Alternative Local Exchange Carrier, another term for Competitive Local Exchange Carrier.**
- 5.2 Attachment - As used in this practice "attachment" means any attachment by a cable television system or provider of telecommunications service to a pole, duct, conduit, or right of way owned or controlled by BellSouth. Section 703 of the Telecommunications Act includes all attachments under the term "pole attachment".**
- 5.3 CLEC - Competitive Local Exchange Carrier.**
- 5.4 ILEC - Incumbent Local Exchange Carrier, such as BellSouth.**
- 5.5 Inspection - A physical examination of Licensee's attachments or conduit occupancy by Licensor's employees, agents, or contractors to determine adherence to construction standards and safety codes, or to verify the number of attachments or conduit occupied.**
- 5.6 Interconnection Agreement - The comprehensive master agreement between the ILEC and CLEC which governs major issues such as unbundling, collocation, resale, number portability, and access to structures. The complete details of access to structures are usually included in a license agreement, or a portion of the interconnection agreement.**
- 5.7 License Agreement - The license agreement outlines specific procedures and obligations for access to structures owned or controlled by BellSouth, including poles, ducts, conduit, and right of way. It may be incorporated into an interconnection agreement, or executed as a separate agreement. In addition, license agreements may be executed by companies other than CLECs who are authorized access to BellSouth structures.**

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- 5.8 Licensee** - The party to whom a license is granted. In the case of a license agreement for a CLEC to attach to BellSouth structures, the CLEC is the licensee.
- 5.9 Licenser** - The party granting a license. In the case of a license agreement for a CLEC to attach to BellSouth structures, BellSouth is the Licenser.
- 5.10 Make-Ready Work** - The work operations (and material) necessary to provide structure space to accommodate Licensee's facilities where existing space is inadequate.
- 5.11 Prelicense Survey** - A physical examination of outside plant structures to identify the work operations and material needed to provide the structure space requested by the Licensee in an Application and Pole Attachment License or in an Application and Conduit Occupancy License.
- 5.12 Right of Way Definition** - In its broadest sense, the term "right of way" refers to the right that one party has to use land belonging to another. Evidence of the right to use someone's property is usually a written document; however, certain rights may be acquired even in the absence of a written agreement.
- 5.13 SPOC** - Single point of contact. The BellSouth SPOC for structures access management is the Competitive Structures Provisioning Center. Some of the agreements with CLECs also designate a single point of contact in their organization.

- 5.14 Structures** - As used in these guidelines the term "structures" includes poles, ducts, conduits, and right of way owned or controlled by BellSouth. Building entrance facilities may or may not be owned or controlled by BellSouth and access may be granted by BellSouth to others only in those instances where the Company has the authority to do so. If the Company does not control access to the property where the facilities are located, then in some cases the CLEC may request that BellSouth assist in securing access. In most situations, such access assistance is billable by the Company.
- 5.15 Telecommunications** - Telecommunications means the transmission, between or among points specified by the user, of information of the user's choosing, without change in the form or content of the information as sent and received.
- 5.16 Telecommunications Carrier** - A telecommunications carrier is any provider of telecommunications services, except that such term does not include aggregators of telecommunications services. A telecommunications carrier shall be treated as a common carrier under the Telecommunications Act only to the extent that it is engaged in providing telecommunications services.
- 5.17 Telecommunications Service** - Telecommunications service means the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available directly to the public, regardless of the facilities used.
- 5.18 Utility** - Any person or entity who is a local exchange carrier or an electric, gas, water, steam, or other public utility, and who owns or controls poles, ducts, conduits, or rights of way used, in whole or in part, for any wire communications. Such term does not include any railroad, any person who is cooperatively organized, or any entity owned by the Federal Government or any State.

6. SUMMARY OF PROCEDURES

Following is an overview of the procedures for making a license application. The procedures for specific applications may vary slightly. In addition, the terms and conditions of different agreements may require minor changes in the procedures outlined herein.

All applications must be on forms approved by BellSouth, and must include sufficient detail for BellSouth to accurately identify the site.

STEP	REMARKS
1	CLEC or other telecommunications service provider applies for license agreement to obtain access to poles, ducts, conduit, and right of way owned or controlled by BellSouth. After the license agreement has been executed by BellSouth, the Licensee may submit applications to attach to or occupy BellSouth structures and right of way.
2	Licensee submits application on approved forms specifying in sufficient detail the facilities and location desired.
3	BellSouth reviews records and determines whether facilities are available (based only on the records). Licensee is advised of the results of the records review. If no facilities are available, Licensee may request an alternative be reviewed, or other attempts be made by BellSouth to provide access, such as rodding ducts, removing abandoned cable, etc.
4	If facilities appear available based on a records review, then Licensee requests a prelicense survey to ensure that facilities are actually physically available, e.g., ducts have not collapsed, there are no unauthorized attachments to the facilities requested, etc.
5	Licensee requests that BellSouth prepare an estimate of any make-ready work necessary to accommodate the Licensee. BellSouth proposes make-ready completion schedule.
6	After make-ready is complete, Licensee submits License Application form.
7	After application is approved by BellSouth, Licensee may proceed with authorized attachments. Includes submitting Form NT-1 with proposed construction start schedule.
8	After attachments are completed, Licensee submits Form NT-1 advising that construction is complete, and submits as-built drawings to BellSouth.

7. SUMMARY OF LICENSE FORMS

7.1 General License Forms

Form Number	Form Name	Remarks
GN-1	INQUIRY REQUEST	After a Structures Access License agreement is in place, completion of this form is the first step in making application for structures access. The request must include sufficient detail for the form to be processed.
GN-2	RECORDS REVIEW REQUEST	Used by Licensee to request access to a BellSouth Records Center. Only Licensees and their representatives with proper approval may be admitted to Records Centers.
GN-3	PRE-LICENSE SURVEY REQUEST	Multi-use turn-around document designed to request records investigations, make-ready estimates, and other activities; to authorize billing, and advise Licensee of status of request.
GN-4	MAKE READY ESTIMATE REQUEST	Multi-use document designed for Licensee to request an estimate of make-ready charges, authorize duct rodding, and request assistance with access to facilities not controlled by BellSouth. Licensee is provided several options regarding make-ready cost estimate approval and work performance.
GN-5	BUILDING SPACE LICENSE AGREEMENT FOR SHARED OWNER-PROVIDED ACCESS	Used where BellSouth may not own or control facilities or access to facilities. Parties to document include the Licensee, BellSouth, and owner.

7.2 Pole Attachment Forms

Form Number	Form Name	Remarks
PL-1	APPLICATION AND POLE ATTACHMENT LICENSE	This is multi-use turn around document used by a CLEC Licensee to request access to poles and to certify that all make-ready issues have been resolved. In addition, the form is used to advise Licensee of BellSouth application approval. Form NT-1 must also be submitted in conjunction with application.
PL-2	POLE SURVEY FORM	Used in lieu of Licensee's engineering drawings to summarize make-ready and related activities that are necessary. Most commonly used on small jobs.
PL-3	ITEMIZED ESTIMATE	This form is completed by BellSouth to provide the Licensee with an itemized estimate of make-ready costs. It may also include mechanized costs data.
PL-4	NOTIFICATION OF SURRENDER OR MODIFICATION OF POLE ATTACHMENT LICENSE	This is a multi-use turn around document used when modifying or relinquishing an attachment. The form requires BST approval, and Form NT-1 must be submitted with the form.

7.3 Right of Way Occupancy Forms

Form Number	Form(s)	Remarks
RW-1	APPLICATION AND RIGHT OF WAY OCCUPANCY LICENSE	This is a two-part form used to request access to BellSouth right of way. In addition, the form is used to advise Licensee of BellSouth's approval of the application. The location description on page 2 of the form must be completed, and Form NT-1 must also be submitted in conjunction with the application.

7.4 Conduit Occupancy Forms

Form Number	Form Name	Remarks
CN-1	APPLICATION AND CONDUIT OCCUPANCY LICENSE	This is multi-use turn around document used to request access to conduit. In addition, the form is used to advise Licensee of BellSouth application approval. Form CN-4 and/or CN-5, and Form NT-1 must be submitted in conjunction with application.
CN-2	CONDUIT SYSTEM DIAGRAM	This form is used to graphically depict a proposed conduit occupancy.
CN-3	CONDUIT SYSTEM - MANHOLE DETAIL	This form is used to detail graphically the specific conduits occupied in a manhole.
CN-4	CABLE TO OCCUPY CONDUIT	This form is used to provide technical specifications of facilities placed in a conduit. Submitted with CN-1 when applicable.
CN-5	EQUIPMENT HOUSINGS TO BE PLACED IN MANHOLES	Used to describe the technical specifications of equipment housings to be placed in manholes. Submitted with CN-1 when applicable.
CN-6	ITEMIZED ESTIMATE	Used to provide an itemized tally of make-ready work and costs to complete an occupancy request.
CN-7	NOTIFICATION OF SURRENDER OR MODIFICATION OF CONDUIT OCCUPANCY LICENSE	This is a multi-use turn around document used when modifying or relinquishing an occupancy. The form requires BST approval, and Form NT-1 must be submitted with the form.

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CN-8	REQUEST FOR ENTRY INTO MANHOLE(S) AND/OR VAULT(S)	This form must be submitted by Licensee and approved by BellSouth before Licensee may enter manholes or vaults. Form NT-1 and location information such as a key map route schematic must also be included.
CN-9	REQUEST TO ROD AND/OR CLEARING OF DUCT(S)	This form must be submitted by Licensee and approved by BellSouth before Licensee may rod ducts. Form NT-1 and location information such as a key map route schematic must also be included.
CN-10	REQUEST TO CORE BORE AND/OR MODIFY MANHOLE(S)	This form must be submitted by Licensee and approved by BellSouth before Licensee may core bore or otherwise modify a manhole. Form NT-1 and location information such as a key map route schematic must also be included.
CN-11	SPARE AND/OR EMERGENCY RESERVATION	This form is used to reserve a spare or emergency conduit where allowed, such as Georgia. The process is similar to that followed for CN-1.

7.5 Notification Forms

Form Number	Form(s)	Remarks
NT-1	CONSTRUCTION PERFORMED AND/OR COMPLETED	This is a multi-use form used at various stages of the application and license process to advise BST of work completion. This form must accompany PL-1, PL-4, CN-1, CN-7, CN-8, CN-9, CN-10, and CN-11.
NT-2	LASHING TO THIRD-PARTY FACILITIES	Turn-around form used by Licensee to request permission to lash to third party facilities. Storm loading calculations and other information must be included, along with Form NT-1.
NT-3	DISPUTE TO MAKE-READY CHARGES	May be used when Licensee disagrees with make-ready estimate prepared in response to PL-1 or CN-1 applications.
NT-4	CHANGE IN PRIORITY FOR PROCESSING APPLICATIONS	May be used by Licensee to request a change in the priority for processing Licensee's applications.
NT-5	CHANGE OF SPOC	Used by Licensee to advise BellSouth of a change in Licensee's designated single point of contact.
NT-6	MAINTENANCE MANAGER	Used by Licensee to advise BellSouth of a change in Licensee's designated maintenance manager.
NT-7	INSPECTION AND COMPLIANCE	May be used on ride-outs and other inspections to quantify unauthorized attachments, infractions, etc.
NT-8	UNSAFE CONDITIONS	Used by Licensee to advise BellSouth when, in its opinion, an unsafe condition exists.
NT-9	DISPUTE OF NON-COMPLIANCE	Used by Licensee to dispute BellSouth's notification of noncompliance.
NT-10	FACILITIES BROUGHT INTO COMPLIANCE	Used by Licensee to notify BellSouth that facilities have been brought into compliance.
NT-11	BELLSOUTH NOTIFICATIONS	May be used by BellSouth to track various notifications.
NT-12	LICENSEE NOTIFICATIONS	May be used by Licensee to track various notifications.
NT-13	CONSENT OF LICENSOR	Used to indicate BellSouth's consent to assignment/transfer of Licensee Agreement.

8. INQUIRY REQUEST (Form GN-1) - EXAMPLE

After a Structures Access License agreement is in place, completion of this form is the first step in making application for structures access.

The request must include sufficient detail for the form to be processed.

Note: BellSouth records provided under this Inquiry Request may not reflect field conditions. Licensee acknowledges that physical inspection is necessary to verify the presence and condition of outside plant facilities and/or right of way, and that in providing record information, BellSouth assumes no liability to licensee or any third party for errors/omissions contained therein.

FORM HEADING	INSTRUCTIONS
1. Licensee Tracking No.	Licensee inserts tracking number assigned by the Licensee for its internal monitoring.
2. BST Tracking (SAM) No.	BellSouth SPOC inserts tracking number assigned by BellSouth. This number will be used throughout the inquiry, application, and billing process to identify the request.
In accordance with the terms...inquiry form.	Licensee inserts full corporate name of Licensee, date of License Agreement, and agreement number assigned by BellSouth.
Inquiry made by:	
3. Authorized Licensee Representative	Licensee inserts name of person authorized to act on behalf of the Licensee.
4. Telephone	Licensee inserts contact number for Licensee's authorized representative.
5. Inquiry Date:	Licensee completes date of inquiry submittal.
6. Response Instructions:	Licensee specifies whether it prefers to receive BellSouth's response by mail or by fax, and completes full mailing address or fax number.
Description of Request and Location:	
7. Records (only):	Licensee specifies the type of records it wishes to review, and also submits Form GN-2.
8. Structures (only):	Licensee specifies the type of attachment or occupancy it wishes to make, and also submits Form GN-3.
9. Records Information:	Licensee specifies its records information option. Records may be reviewed at a BellSouth location following approval of Form GN-2, or forwarded to Licensee's address specified in item 6.

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**INQUIRY REQUEST
(Form GN-1) -
EXAMPLE - Continued**

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10. BellSouth Wire Center:	Licensee completes Wire Center and NPA NNX (area code and prefix) for facility location, if known.
11. County (Parish)-REQUIRED	Licensee inserts County where requested facilities are located. Information is required and used in BST Tracking Number. If more than one county, indicate "Multiple".
12. State-REQUIRED:	Licensee inserts State where requested facilities are located. Information is required and used in BST Tracking Number.
13. Section:	Applicable in Alabama, Florida, Louisiana, and sometimes Georgia. Licensee completes public land Section number(s) where requested facilities are located, if known.
14. Township/Land District:	Applicable in Alabama, Florida, Louisiana, and Georgia. Licensee completes Township or Land District number(s) where requested facilities are located, if known.
15. Range/Land Lot:	Applicable in Alabama, Florida, Louisiana, and Georgia. Licensee completes Range or Land Lot number(s) where requested facilities are located, if known.
16. Description and/or Remarks:	Licensee completes a description of location of requested facilities and/or attaches sketch(es) sufficient for BellSouth to identify the location in its records.

Sequence Note: After completing form through Item 16, Licensee submits Form GN-1 to BellSouth SPOC (CSPC).

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**INQUIRY REQUEST
(Form GN-1) -
EXAMPLE - Continued**

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Mail or fax your request to:	
Competitive Structures Provisioning Center (CSPC)	Licensee forwards Form to CSPC.
Inquiry Response (To be completed by BellSouth)	
	BellSouth SPOC either forwards request to Records Center, or returns Form to Licensee for additional information.